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December 12, 2007

CDM Project File: 5000-55353

Ms. Ana Townsend California Regional Water Quality Control Board - Los Angeles Region 320 W. 4th Street, Suite 200 Los Angeles, California 90013

Subject: Request to Reinject Extracted Groundwater from Well WCC\_06S

Biorecirculation Pilot Test - Former Building 1/36 Former C-6 Facility, 19503 South Normandie Avenue

Los Ángeles, California

File No. 95-036; SLIC No. 410; Site ID No. 1846000 Compliance File CI-9310, Order No. R4-2007-0040

Dear Ms. Townsend:

Camp Dresser & McKee Inc. (CDM), on behalf of Boeing Corporate Real Estate (CRE) (formerly Boeing Realty Corporation), is hereby submitting this request to the California Regional Water Quality Control Board, Los Angeles Region (LARWQCB) for re-injecting groundwater generated during the recent Aquifer Performance Test (APT) conducted at Well WCC\_06S.

System startup and shakedown activities for the biorecirculation pilot test were initially planned to start in August 27, 2007. However, as mentioned in the Third Quarter 2007 Waste Discharge Requirements (WDR) Monitoring Report (CDM, October 26,2007), a sustained flow of less than 1 gallon per minute (gpm) was observed during the startup, which is substantially less than the anticipated design flow of 12 gpm. Since then CDM has been implementing actions to increase the groundwater production rate for the pilot system close to the design or other suitable rate that would achieve the objectives of the biorecirculation pilot test. One of these actions included performance of a 30-hour APT at WCC\_06S, which is one of the downgradient performance monitoring wells (designated as Group B) proposed in the Monitoring and Reporting Program under WDR Order No. R4-2007-0040, Compliance File CI-9310 (Site-Specific WDR Permit) and located within the pilot study treatment area (See attached Figure 1). During the course of the APT, approximately 14,000 gallons of groundwater from WCC\_06S were generated, which is currently stored on-site in Baker tanks. A summary and results of the APT will be provided in the next WDR monitoring report.

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CDM hereby requests permission from LARWQCB to re-inject the WCC\_06S APT water into one or more of the pilot study amendment wells during the operation of the pilot study and following treatment with Whey powder, which is one of the electron donors included in the Site-Specific WDR Permit. Prior to re-injection, the ground water will be treated through the pilot system with approximately 3% Whey solution (30,000 milligrams per liter [mg/L]), which is the same electron donor concentration proposed for the pilot test. The re-injection of WCC\_06S water is expected to take up to one week. Based on the above information, it is believed that re-injection of WCC\_06S APT water is not expected to result in any significant, adverse impacts to the groundwater beneath the Site.

If you have any questions or concerns regarding this request, please call Robert Scott at (562) 497-6176 or Joe Weidmann at (805) 563-8600.

Very truly yours,

Ravi Subramanian, P.E

Principal

Attachment

Cc: Robert Scott, The Boeing Company
Joe Weidmann, Haley & Aldrich, Inc.

